

# Morgan Lewis

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December 9, 2019

APPLICATION GRANTED  
SO ORDERED *Vernon S. Broderick*  
VERNON S. BRODERICK  
U.S.D.J. 12/11/2019

**Via ECF**

The Honorable Vernon S. Broderick  
United States District Court  
For the Southern District of New York  
40 Foley Square, Courtroom 518  
New York, NY 10007

**Re: *Delacruz v. Christmas Tree Shops, Inc.*, 1:19-cv-10711-VSB**  
**Request to Extend Defendant's Time to Respond to Complaint**

Dear Judge Broderick:

We represent defendant Christmas Tree Shops, Inc. ("Defendant") in the above-referenced action. Pursuant to Rules I(A) and I(G) of Your Honor's Individual Practices, we write with the consent of counsel for plaintiff Emmanuel Delacruz ("Plaintiff"), respectfully to request that the Court extend Defendant's time to respond to the Complaint from December 12, 2019 to January 27, 2020. This is Defendant's first request for an extension of time to file a response to the Complaint.

In support of this request, counsel for Defendant states that it recently has been engaged in this matter and needs time to become familiar with the relevant facts and allegations. As noted above, Plaintiff's counsel consents to this request. If granted, this extension will not affect any other date scheduled in this action.

We thank the Court in advance for its consideration of this request.

Respectfully submitted,

/s/ Michael F. Fleming

Michael F. Fleming

*Attorney for Defendant*

cc: All Counsel of Record (via ECF)

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